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April 2, 2012

## PUBLIC REFERENCE COPY

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### VIA ELECTRONIC FILING

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Federal Communications Commission  
445 12th Street, S.W., Room TW-A306  
Washington, DC 20554

### VIA HAND DELIVERY

Karen Majcher  
Vice President, High Cost & Low Income Division  
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2000 L Street, N.W., Suite 200  
Washington, D.C. 20036

**Re: Connect America Fund, WC Docket No. 10-90**

**Telecommunications Carriers Eligible for Universal  
Service Support, WC Docket No. 09-197**

Dear Secretary Dortch:

On behalf of Corr Wireless Communications, LLC (SAC 259005) ("Corr Wireless"), please find attached a redacted public version of Corr Wireless's Annual Report under Section 54.313 of the FCC's Rules ("ETC Report"). The attached ETC Report has been marked "**REDACTED – FOR PUBLIC INSPECTION.**"

Corr Wireless is also submitting to the FCC, under separate cover, a confidential version of the

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
April 2, 2012  
Page 2

**PUBLIC REFERENCE COPY**

ETC Report. The confidential version is marked "**CONFIDENTIAL – NOT FOR PUBLIC INSPECTION.**"

Please contact the undersigned at (703) 584-8666 if any questions arise concerning the above-referenced enclosures or if you require any additional information.

Sincerely,



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David A. LaFuria  
Steven M. Chernoff  
John Cimko

Attorneys for:  
*Corr Wireless Communications, LLC*

Attachment

**ATTACHMENT**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Telecommunications Carriers Eligible	)	WC Docket No. 09-197
for Universal Service Support	)	
	)	
Connect America Fund	)	WC Docket No. 10-90

**CORR WIRELESS COMMUNICATIONS, LLC**

**ANNUAL REPORT**

Corr Wireless Communications, LLC (“Corr Wireless” or the “Company”), an Eligible Telecommunications Carrier (“ETC”) in the State of Alabama, hereby provides the Commission with its annual report containing information as set forth in Section 54.313 of the Commission’s Rules<sup>1</sup> and in the Commission’s Report and Order in the above-captioned WC Docket No. 10-90 proceeding.<sup>2</sup>

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<sup>1</sup> 47 C.F.R. § 54.313. The Wireline Competition Bureau and the Wireless Telecommunications Bureau have clarified “that ETCs that have been designated by the Commission are still required to file . . . information [specified in 47 C.F.R. § 54.313(a)(2)-(6)] with respect to their provision of voice service during 2011.” *Connect America Fund, et al.*, WC Docket No. 10-90, *et al.*, Order, DA 12-147 (WCB, WTB, rel. Feb. 3, 2012), 77 Fed. Reg. 14297 (Mar. 9, 2012) (“February 3 Order”), at para. 9.

<sup>2</sup> *Connect America Fund, et al.*, WC Docket No. 10-90, *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, 2011 WL 5844975 (rel. Nov. 18, 2011), 76 Fed. Reg. 73830 (Nov. 29, 2011), 76 Fed. Reg. 78384 (Dec. 16, 2011), 76 Fed. Reg. 81562 (Dec. 28, 2011) (“CAF Order”), *recon.*, FCC 11-189 (rel. Dec. 23, 2011), *further recon. pending, petitions for review pending, Direct Commc’ns Cedar Valley v. FCC*, No. 11-9581 (10th Cir. filed Dec. 18, 2011) (and consolidated cases).

Corr Wireless was first designated as an ETC in Alabama on October 31, 2002, with subsequent designations on February 3, 2006, and May 1, 2008.<sup>3</sup> The areas in which the Company was designated in 2002, 2006, and 2008 are collectively referred to as the “Designated Service Area.”

**1. Construction Plan Progress and Use of Support.**

Pursuant to Section 54.313(a)(1) of the Commission’s Rules, an ETC must provide:

A progress report on its five-year service quality improvement plan pursuant to §54.202(a), including maps detailing its progress towards meeting its plan targets, an explanation of how much universal service support was received and how it was used to improve service quality, coverage, or capacity, and an explanation regarding any network improvement targets that have not been fulfilled in the prior calendar year.<sup>4</sup>

Corr Wireless provides its updated service quality improvement plan in Exhibit A.<sup>5</sup> For the period from January 1, 2011, through December 31, 2011, (the “Reporting

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<sup>3</sup> Corr Wireless was designated as an ETC in various service areas in Alabama in 2002, 2006, and 2008. See *Federal-State Joint Board on Universal Service, Corr Wireless Communications, LLC, Petition for Designation as an Eligible Telecommunications Carrier*, CC Docket No. 96-45, Order, DA 02-2855 (WCB Oct. 31, 2002); *Federal-State Joint Board on Universal Service, Corr Wireless Communications, LLC, Petition for Designation as an Eligible Telecommunications Carrier*, CC Docket No. 96-45, Order, DA 06-286 (WCB Feb. 3, 2006); *High-Cost Universal Service Support, Federal-State Joint Board on Universal Service, Alltel Communications, Inc., et al., Petitions for Designation as Eligible Telecommunications Carriers, RCC Minnesota, Inc., and RCC Atlantic, Inc., New Hampshire ETC Designation Amendment*, WC Docket No. 05-337, CC Docket No. 96-45, Order, 23 FCC Rcd 8834 (2008).

<sup>4</sup> 47 C.F.R. § 54.313(a)(1). See *CAF Order* at para. 580 (footnote omitted) (emphasis added) (concluding that “all ETCs must include in their annual reports the information that is currently required by section 54.209(a)(1)-(a)(6)—specifically, a progress report on their five-year build-out plans; data and explanatory text concerning outages; unfulfilled requests for service; complaints received; and certifications of compliance with applicable service quality and consumer protection standards and of the ability to function in emergency situations”).

<sup>5</sup> The information submitted in Exhibit A is also proprietary and competitively sensitive. The information therefore is also being submitted under seal and is subject to Corr Wireless’s request for confidential treatment. Exhibit A includes a progress report covering only two years in light of the fact that the Commission has indicated that:

Period”), the Company has received a total of [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] in Universal Service Support. Information provided below is as of December 31, 2011, which is the Company’s most recent quarterly period for which accounting data is available.

During the Reporting Period, Corr Wireless invested [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] in capital improvements.<sup>6</sup> Specifically, during the Reporting Period, Corr Wireless [BEGIN CONFIDENTIAL] [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] [END CONFIDENTIAL]

TIAL]

## 2. Outage Reporting.

During the Reporting Period, Corr Wireless [BEGIN CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED]

Recognizing that existing five-year build out plans may need to change to account for new broadband obligations set forth in this Order, we require all ETCs to file a new five-year build-out plan in a manner consistent with 54.202(a)(1)(ii) [of the Commission's Rules] by April 1, 2013. Under the terms of new section 54.313(a) [of the Commission's Rules], all ETCs will be required to include in their annual 54.313 reports information regarding their progress on this five-year broadband build-out plan beginning April 1, 2014.

CAF Order at para. 587. See *February 3 Order* at para. 6. In light of this requirement to submit a new five-year build-out plan as part of its April 2013 annual report, Corr Wireless has concluded that the progress report in the attached Exhibit A regarding its current service quality improvement plan should include projections only through 2013.

[illegible]

[END CONFIDENTIAL]<sup>7</sup>

### 3. Service Requests.

During the Reporting Period, there were no unfulfilled requests for service from potential customers within the designated ETC service area.<sup>8</sup> However, Corr Wireless hereby certifies that it continues to follow a six-step process for provisioning service to requesting customers.<sup>9</sup>

<sup>7</sup> See 47 C.F.R. § 54.313(a)(2). With regard to 911 special facilities, Section 4.5(e) of the Commission's Rules provides as follows:

An outage that potentially affects a 911 special facility occurs whenever:

(1) There is a loss of communications to PSAP(s) potentially affecting at least 900,000 user-minutes and: The failure is neither at the PSAP(s) nor on the premises of the PSAP(s); no reroute for all end users was available; and the outage lasts 30 minutes or more; or

(2) There is a loss of 911 call processing capabilities in one or more E-911 tandems/selective routers for at least 30 minutes duration; or

(3) One or more end-office or MSC switches or host/remote clusters is isolated from 911 service for at least 30 minutes and potentially affects at least 900,000 user-minutes; or

(4) There is a loss of ANI/ALI (associated name and location information) and/or a failure of location determination equipment, including Phase II equipment, for at least 30 minutes and potentially affecting at least 900,000 user-minutes (provided that the ANI/ALI or location determination equipment was then currently deployed and in use, and the failure is neither at the PSAP(s) or on the premises of the PSAP(s)).

47 C.F.R. 4.5(e).

<sup>8</sup> See 47 C.F.R. § 54.313(a)(3).

<sup>9</sup> This six-step process was formerly prescribed in Section 54.202(a)(1) of the Commission's Rules, but these provisions of Section 54.202 have been repealed by the Commission. See *CAF Order*, App. A (revising Section 54.202). Section 54.313(a)(3) of the Commission's Rules now requires that an ETC must "detail how it attempted to provide service to those potential customers" whose requests for service were unfulfilled in the prior calendar year. Corr Wireless followed the six-step process during the Reporting Period, and will continue to utilize the six-step process as a means of complying with the requirement established in Section 54.313(a)(3).

**REDACTED – FOR PUBLIC INSPECTION**

Specifically, in response to any such requests for service at a residence or business, Corr Wireless will take the following steps:

1. If a request comes from a customer within its existing network, Corr Wireless will provide service immediately using its standard customer equipment.

2. If a request comes from a customer residing in any area where Corr Wireless does not provide service, Corr Wireless will take a series of steps to provide service.

- \* First, it will determine whether the customer's equipment can be modified or replaced to provide acceptable service.
- \* Second, it will determine whether a roof-mounted antenna or other network equipment can be deployed at the customer's premises to provide service.
- \* Third, it will determine whether adjustments at the nearest cellular facility site can be made to provide service.
- \* Fourth, it will determine whether there are any other adjustments to network or customer facilities that can be made to provide service.
- \* Fifth, it will explore the possibility of offering the resold services of carriers that have facilities available to the customer location involved.
- \* Sixth, Corr Wireless will determine whether an additional cellular facility site, a cell-extender, or repeater can be employed or can be constructed to provide service, and evaluate the costs and benefits of using scarce high-cost support to serve the number of customers requesting service.

If there is no possibility of providing service short of these measures, Corr Wireless will notify the customer and notify the Commission of how many requests for service could not be filled in its next annual report filed pursuant to Section 54.313 of the Com-



mission's Rules. Corr Wireless acknowledges that the Commission will retain authority to resolve any customer complaints alleging that Corr Wireless has refused to respond to a reasonable request for service.

**4. Consumer Complaints.**

During the Reporting Period, Corr Wireless did not receive and is not aware of any complaints filed with the Commission in the Designated Service Area.

**5. Compliance with Service Quality and Consumer Protection Standards.**

The Commission indicated in the *CAF Order* that ETCs must certify compliance with applicable service quality and consumer protection standards,<sup>10</sup> and also specifically noted that, if an ETC is complying with “the voluntary code of conduct concerning ‘bill shock’” or the CTIA–The Wireless Association® (“CTIA”) Consumer Code for Wireless Service (“CTIA Code” or “Code”), it should so indicate in its annual report.<sup>11</sup>

Corr Wireless hereby certifies that it has reviewed its service quality and consumer protection practices, and that these practices ensure that Corr Wireless:

- (1) Discloses rates and terms of service to customers.
- (2) Makes available maps showing where service is generally available.
- (3) Provides contract terms to customers and confirms changes in service.
- (4) Allows a trial period for new service.
- (5) Provides specific disclosures in advertising.
- (6) Separately identifies carrier charges from taxes on billing statements.

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<sup>10</sup> *CAF Order* at para. 580. *See* 47 C.F.R. § 54.313(a)(5).

<sup>11</sup> *CAF Order* at para. 580 n.956. The CTIA Code can be viewed on the CTIA website at [http://www.ctia.org/consumer\\_info/service/index.cfm/AID/10352](http://www.ctia.org/consumer_info/service/index.cfm/AID/10352) (accessed Mar. 15, 2012).

- (7) Provides customers the right to terminate service for changes to contract terms.
- (8) Provides ready access to customer service.
- (9) Promptly responds to consumer inquiries and complaints received from government agencies.
- (10) Abides by policies for protection of consumer privacy.
- (11) Provides consumers with free notifications for voice, data and messaging usage, and international roaming.

These service quality and consumer protection practice categories are the same as those included in the CTIA Code as currently in effect.<sup>12</sup> Corr Wireless notes that, with respect to the eleventh point listed above, CTIA has indicated the following:

Each wireless provider will provide, at no charge: (a) a notification to consumers of currently-offered and future domestic wireless plans that include limited data allowances when consumers approach and exceed their allowance for data usage and will incur overage charges; (b) a notification to consumers of currently-offered and future domestic voice and messaging plans that include limited voice and messaging allowances when consumers approach and exceed their allowance for those services and will incur overage charges; and (c) a notification to consumers without an international roaming plan/package whose devices have registered abroad and who may incur charges for international usage. Wireless providers will generate the notifications described above to postpaid consumers based on information available at the time the notification is sent. Wireless consumers will not have to affirmatively sign up in order for these notifications to be sent. Each wireless provider shall provide its customers at least two of these alerts by October 17, 2012 and all of these alerts by April 17, 2013. Wireless providers will clearly and conspicuously disclose

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<sup>12</sup> Corr Wireless is not a member of CTIA, and therefore is not listed by CTIA as having implemented the provisions of the CTIA Code. Nonetheless, as Corr Wireless has explained in this report, its service quality and consumer protection practices are identical to those prescribed in the CTIA Code. The eleventh point to the CTIA Code, regarding free notifications to consumers, was added in October 2011.

tools or services that enable consumers to track, monitor and/or set limits on voice, messaging and data usage.<sup>13</sup>

Corr Wireless hereby certifies that it intends to comply with the provisions of the eleventh point listed above, which is based upon the CTIA Code, pursuant to the implementation schedule established in the Code.

In connection with its review of its service quality and consumer protection practices, Corr Wireless has gathered various documentation demonstrating that these practices meet or exceed the requirements of the *CAF Order* and Section 54.313(a)(5) of the Commission's Rules in each of the practice categories enumerated above. Corr Wireless will make this documentation available to the Commission upon request.

**6. Ability to Remain Functional in Emergencies.**

Section 54.202(a)(2) of the Commission's Rules<sup>14</sup> requires that each ETC must "[d]emonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."<sup>15</sup> Section 54.313(a)(6) requires ETCs to certify that they are "able to function in emergency situations as set forth in §54.202(a)(2) . . . ."<sup>16</sup>

Corr Wireless is mindful of the importance of ensuring uninterrupted service so that law enforcement and public safety officials, as well as the general public, can make

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<sup>13</sup> CTIA Code, [http://www.ctia.org/consumer\\_info/service/index.cfm/AID/10352](http://www.ctia.org/consumer_info/service/index.cfm/AID/10352) (accessed Mar. 15, 2012).

<sup>14</sup> 47 C.F.R. § 54.202(a)(2).

<sup>15</sup> 47 C.F.R. § 54.202(a). See *CAF Order* at para. 580.

<sup>16</sup> 47 C.F.R. § 54.313(a)(6).

important calls in the event of a hurricane or other emergency. Corr Wireless hereby certifies that the Company is capable of functioning in emergency situations as defined in the above-quoted provisions of Section 54.202(a)(2) via the Company's generators and via temporary microwave facilities.

**Conclusion**

Corr Wireless trusts that the Commission will find this Annual Report to be responsive to the compliance materials requested in the *CAF Order*, and in Section 54.313

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of the Commission's Rules. Should the Commission have any questions or require any additional information, please contact:

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Respectfully submitted,



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Attorneys for:  
*Corr Wireless*  
*Communications, LLC*

April 2, 2012

**EXHIBIT A**

**REDACTED – FOR PUBLIC INSPECTION**

**EXHIBIT A**

**UPDATED SERVICE QUALITY AND IMPROVEMENT PLAN**

**THIS EXHIBIT IS WITHHELD FROM THE PUBLIC COPY  
AS THE FILER HAS REQUESTED CIONFIDENTIAL TREATMENT**

## **DECLARATION**

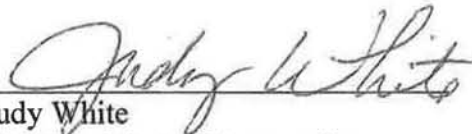


### DECLARATION UNDER PENALTY OF PERJURY

I, Judy White, do hereby declare under penalty of perjury as follows:

1. I am the Vice President of Accounting for Corr Wireless Communications, LLC ("Corr Wireless").
2. This Affidavit is submitted in support of Corr Wireless's Annual Report, pursuant to the *Connect America Fund*, WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, 2011 WL 5844975 (rel. Nov. 18, 2011) and Section 54.313 of the Commission's Rules.
3. I declare under penalty of perjury that the statements contained in the foregoing Annual Report are true and correct to the best of my knowledge.

Executed on March 29, 2012

  
Judy White  
Vice President of Accounting  
Corr Wireless Communications, LLC

SUBSCRIBED, SWORN TO AND ACKNOWLEDGED before me this 29<sup>th</sup> day of  
March, 2012



  
NOTARY PUBLIC

My Commission Expires: July 17, 2012